

COMES NOW, Defendant CARLOS CARRUITERO by and through undersigned counsel and requests an Extension of Time to File Joint Pretrial Stipulation and in support thereof would state as follows:

- 1. The parties are required to file their Joint Pretrial Statement on or before the 17th day of September 2021. The trial of the matter herein is scheduled to begin on the 18th day of October 2021 (ECF 368).
- 2. The undersigned is a sole practitioner whose only assistant was out with Covid and other complications for two weeks during which time her husband contracted Covid and died.
- 3. As a result of the forgoing the undersigned is unable to meet this Court's deadline for the Pretrial submission.
- 4. A brief extension of time to file the Joint Pretrial Statement is requested to Wednesday the 22nd day of September 2021.
 - 5. This request will not affect the schedule for the trail of this matter.
- 5. Counsel for the Plaintiff has been consulted and does not oppose the relief requested herein.

WHEREFORE the Defendant CARLOS CARRUITERO requests the Court issue an Order extending the deadline for the filing of a Joint Pretrial Statement through the 22nd day of September 2021 and issue any other order it deems appropriate under the facts and circumstance hereon

RESPECTFULLY SUBMITTED to the United States District Court Southern District of New York on this 14th day of September 2021

/S/

Richard Siegmeister, Esquire Richard Siegmeister P.A. Attorneys for CARLOS CARRUITERO 3850 Bird Road, Floor 10 Miami, Florida 33146 Telephone: 305-859-7376

Telephone: 305-859-7376 Email: rspa111@att.net

rspalaw@att.net

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of forgoing has been furnished by the Courts electronic noticing system (CM/ECF) to all entitled to such notice on this 14th day of September 2021.

/S/ Richard Siegmeister, Esquire

Z:\MyFiles\Data - Old\STATCORT\Carruitero, Carlos Eduardo\210914 Motion Ext timer.wpd